

GABROY | MESSER
 170 S. Green Valley Pkwy., Suite 280
 Henderson, Nevada 89012
 (702) 259-7777 FAX: (702) 259-7704

Christian Gabroy
 (#8805)
 Kaine Messer
 (#14240)
 GABROY | MESSER
 The District at Green Valley Ranch
 170 South Green Valley Parkway
 Suite 280
 Henderson, Nevada 89012
 Tel: (702) 259-7777
 Fax: (702) 259-7704
 christian@gabroy.com
 kmesser@gabroy.com
Attorneys for Plaintiff Jose Ismael Zuniga

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

JOSE ISMAEL ZUNIGA, on behalf of
 himself and all others similarly situated;

Plaintiff,

vs.

UNFORGETTABLE COATINGS INC.;
 UNFORGETTABLE COATINGS OF
 IDAHO LLC; DOES 1 through 50,
 inclusive,

Defendants.

Case No.: 2:21-cv-01221-JCM-MDC

**JOINT STIPULATION TO REQUEST A
 MEDIATED SETTLEMENT
 CONFERENCE PER LR 16.5**

**JOINT STIPULATION TO REQUEST MEDIATED SETTLEMENT CONFERENCE PER
 LR 16.5**

Jose Ismael Zuniga ("Plaintiff" or "Zuniga") and Defendants Unforgettable Coatings Inc. and Unforgettable Coatings of Idaho LLC's (together "Defendants"), by and through their respective counsel of record, and pursuant to LR 16-5, hereby stipulate to jointly request that the parties be ordered to attend a settlement conference in this matter. The parties have not privately mediated this matter.

As previously indicated, the parties have engaged in extensive discussion regarding potential resolution of this matter. See ECF No. 48, pp. 1-2. To that end, Defendants have propounded voluminous class-wide data, Plaintiff has been analyzing same, and resolution discussions are ongoing. The parties will continue to work together pursuant to Fed. R. Civ. P. 1 and strive to achieve resolution.

At this time, the parties agree that it would be an appropriate and efficient use of judicial resources for this matter to be ordered to settlement conference presided over by a United States Magistrate Judge per Local Rule 16.5. Therefore, the parties respectfully submit this stipulation requesting that: (1) this matter be ordered to settlement conference accordingly for a date after October 1, 2025; (2) all case deadlines be stayed pending completion of the settlement conference; and (3) if the parties do not reach a resolution at the settlement conference that they will submit an amended scheduling order addressing the remaining case deadlines within ten (10) days after the settlement conference.

Dated this 14th day of July 2025.

GABROY | MESSER

By: /s/ Christian Gabroy
 Christian Gabroy
 (#8805)
 Kaine Messer
 (#14240)
 The District at Green Valley Ranch
 170 South Green Valley Parkway
 Suite 280
 Henderson, NV 89012
 christian@gabroy.com
 kmesser@gabroy.com

Attorneys for Plaintiff
 Jose Ismael Zuniga

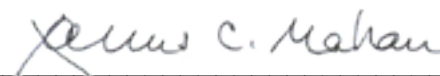
Dated this 14th day of July 2025.

JACKSON LEWIS P.C.

By: /s/ Joshua Sliker
 Joshua Sliker, Esq.
 Nevada Bar No. 12493
 Scott Barbag, Esq.
 Nevada Bar No. 14164
 300 South Fourth Street
 Suite 900
 Las Vegas, Nevada 89101

Attorneys for Defendants
Unforgettable Coatings Inc. and
Unforgettable Coatings of Idaho LLC

IT IS SO ORDERED:


 UNITED STATES DISTRICT JUDGE

DATED: July 17, 2025

GABROY | MESSER
 170 S. Green Valley Pkwy., Suite 280
 Henderson, Nevada 89012
 (702) 259-7777 FAX: (702) 259-7704